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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK **USDC SDNY** DOCUMENT

UNITED STATES OF AMERICA

-v.-

SOULEYMANE BAGAYOKO,

Defendant.

----X

The United States Attorney charges:

COUNT ONE

- From in or about March 2010 through and including 1. in or about April 2010, in the Southern District of New York and elsewhere, SOULEYMANE BAGAYOKO, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.
- It was a part and an object of the conspiracy that SOULEYMANE BAGAYOKO, the defendant, and others known and unknown, unlawfully, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions, the accounts and deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such

financial institutions, by means of false and fraudulent pretenses, representations, and promises.

Overt Acts

- 3. In furtherance of said conspiracy and to effect its illegal object, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:
- a. A co-conspirator not named herein ("CC-1") obtained three counterfeit checks.
- b. SOULEYMANE BAGAYOKO, the defendant, and CC-1 obtained three fraudulent driver's licenses from a location in the Bronx, New York. Each of the three licenses purported to be the license for a payee for one of the three counterfeit checks.
- c. On or about April 6, 2010, CC-1 provided the three counterfeit checks and the three fraudulent driver's licenses to another co-conspirator not named herein ("CC-2").

(Title 18, United States Code, Section 1349.)

PREET BHARARA

United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INFORMATION

10 Cr.

PREET BHARARA
United States Attorney.